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February 20, 2024

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of N.J.
Mitchell S. Cohen Building &
U.S. Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie,

Please accept this letter brief in response to ZHP's motion to amend its
Answer.

ZHP's Answer was clear, stating that Huahai US, Princeton, and Solco are
wholly owned subsidiaries of ZHP. This was relied on by Plaintiffs in citing to that
judicial admission in Plaintiffs' Statement of Undisputed Material Facts in support

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of Plaintiffs' dispositive motions. ([ECF 2569-3](#) ¶ 5). Plaintiffs assumed that this was a refinement of the testimony provided by ZHP's corporate representatives.

ZHP sought Plaintiffs' consent to the proposed amendment to the Answer and Plaintiffs voiced their concern that they had already relied on the Answer, and did not want to consent to a pleading amendment that would suddenly distance ZHP from its subsidiaries. ZHP wrote to Plaintiffs on January 29, 2024, and confirmed: "As we discussed during this weekend's meet and confer, ZHP's First Amended Answer simply provides corrected information about the ownership of Solco and Princeton – namely that they are not wholly-owned subsidiaries of ZHP, as originally stated in the Answer filed on December 7, 2023. Instead, Princeton is a wholly-owned subsidiary of the holding company PrinJohnson, of which ZHP is the majority owner, and Solco is a wholly-owned subsidiary of Princeton. **Defendants do not intend to contest that ZHP is the parent of Princeton and Solco, nor to inject issues related to PrinJohnson into the trial.** With that understanding, can we inform the Court that plaintiffs do not object to the motion to amend the Answer?" (Ex. 1 hereto). Plaintiffs sought further assurances, ZHP would not agree to further discuss, and this motion followed.

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Plaintiffs do not oppose the motion to amend based on the representation by ZHP that it will not contest that it is the parent of Prinston and Solco, regardless of the role of PrinJohnson (understood to be a holding company), and request that this representation be recited in the Order.

Thank you for your courtesies and consideration.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)